

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

TRACY L. HAGEN,)	
Plaintiff,)	
)	
v.)	Case No. 3:11-CV-00359-JTM-CAN
)	
FIRSTSOURCE FINANCIAL)	
SOLUTIONS, LLC,)	
JOHN D. KRISOR, JR.,)	
DOES 1 through 10,)	
Defendants.)	

MOTION FOR INITIAL ENLARGEMENT
OF TIME

Defendant, FirstSource Financial Solutions, LLC and FirstSource Financial Solutions, LLC for and on behalf of Does 1 through 10 (herein individually and collectively “First Source”), by counsel, respectfully move this Court for an Order granting FirstSource an initial twenty-eight (28) day enlargement of time to respond to the Complaint and/or otherwise defend, which motion is being made for the following reasons:

1. On September 6, 2011, Plaintiff filed a complaint against FirstSource.
2. FirstSource’s answer or other response will be due September 29, 2011.
3. The undersigned, counsel for FirstSource has just been retained to represent FirstSource in this matter.
4. The undersigned has not had sufficient enough time to discuss this matter with his client so as to be able to formulate the proper responsive pleading and/or otherwise defend.
5. The undersigned herein represents to this Court, this motion is being made in good faith and not to delay the proceedings before this Court.

6. The undersigned herein represents to this Court, he has attempted to contact Plaintiff via telephone to obtain her position on this Motion, but was unable to reach Plaintiff prior to the filing of this Motion, despite a good faith attempt

WHEREFORE, FirstSource, by counsel, respectfully moves this Court for an Order enlarging the time up to and including October 27, 2011 to file an answer or other response to Plaintiff's Complaint and/or otherwise defend; and for all other proper relief.

KIGHTLINGER & GRAY, LLP

s/Peter A. Velde
Peter A. Velde
Attorneys for FirstSource

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2011, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Todd J. Kaiser
Ogle Deakins Nash Smoak & Stewart, PC
111 Monument Circle Suite 4600
Indianapolis, IN 46204

and I hereby certify that a copy of the foregoing pleading has been served upon Plaintiff pro se by first class U.S. mail, postage prepaid on September 27 2011 upon:

Tracy L. Hagen
198 Pheasant Hills Court
Valparaiso, IN 46385

/s/Peter A. Velde
Peter A. Velde

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